

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

**NORTH DAKOTA HUMAN RIGHTS
COALITION, IMMIGRANT
DEVELOPMENT CENTER, and
PLAINTIFF DOE,**

Plaintiffs,

v.

**PATRIOT FRONT, THOMAS
ROUSSEAU, TREVOR VALESCU, and
JOHN DOES 1-10,**

Defendants.

Case No.: Case 3:23-cv-00160-PDW-ARS

PLAINTIFFS' STATEMENT OF RECENT DECISION

Plaintiffs respectfully submit this Statement of Recent Decision in connection with their Opposition to Defendants Thomas Rousseau and Trevor Valescu's Motion to Dismiss. (See ECF No. 24.)

On March 31, 2024, the United States District Court for the Eastern District of Virginia decided *Sealed Plaintiff v. Patriot Front*, Case No. 3:22-cv-00670-MHL (E.D. Va. Mar. 31, 2024) (denying individual defendants' motion to dismiss complaint alleging violations of 42 U.S.C. §§ 1985(3) and 1986 based on racially motivated vandalism of mural depicting Black athlete), attached as Exhibit A.

Plaintiffs hereby give notice of this authority.

Dated this 15th day of April, 2024.

By: /s/ Timothy Q. Purdon

Timothy Q. Purdon (ND Bar No. 05392)
ROBINS KAPLAN LLP
1207 West Divide Avenue, Suite 200
Bismarck, ND 58501
Telephone: (701) 255-3000
Facsimile: (612) 349-8767
tpurdon@robinskaplan.com

Christine Wong (CA Bar No. 284026)
William Frentzen (CA Bar No. 343918)
Christina Dierolf (CA Bar No. 335258)
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105-2482
Telephone: (415) 268-7000
Facsimile: (415) 268-7522
christinewong@mofo.com
wfrentzen@mofo.com
cdierolf@mofo.com

Arthur Ago (DC Bar No. 463681)
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1500 K Street, NW, Suite 900
Washington, DC 20005
Telephone: (202) 662-8600
Facsimile: (202) 783-0857
aago@lawyerscommittee.org

Attorneys for Plaintiffs